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CLERK OF U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEPHEN P. BERZON (#46540)

sberzon@altshulerberzon.com

LINDA LYE (#215584)

llye@altshulerberzon.com

CLAIRE P. PRESTEL (#235649)

cprestel@altshulerberzon.com

Altshuler Berzon LLP

177 Post Street, Suite 300

San Francisco, CA 94108

Telephone: (415) 421-7151

Facsimile: (415) 362-8064

ELIZABETH GINSBURG

(Application for Admission *Pro Hac Vice* Pending)

elizabeth.ginsburg@alpa.org

Air Line Pilots Association, International

535 Herndon Parkway

Herndon, VA 20172-1169

Telephone: (703) 481-2424

Facsimile: (703) 481-2478

E-filing

Attorneys for Plaintiffs

JL

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SKYWEST PILOTS ALPA ORGANIZING
COMMITTEE, *et al.*,

Plaintiffs,

vs.

SKYWEST AIRLINES, INC.,

Defendant.

CASE NO. 07

2688

DECLARATION OF
DAVID BOEHM IN SUPPORT OF
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

Declaration of David Boehm

1. My name is David Boehm. I reside in Placentia, California. I have been an airline pilot employed by SkyWest Airlines since November 2004. I currently serve as an RJ captain based in Salt Lake City, UT.

2. I have been and remain an open and active member of the SkyWest Pilots ALPA Organizing Committee [the "OC"], which was formed to encourage the pilots of SkyWest to elect ALPA as their collective bargaining representative. The pilots of SkyWest are not represented by a labor union for collective bargaining purposes.

3. My first conflict with management was over my wearing of an ALPA lanyard. ALPA, the Air Line Pilots Association, Intl., provided the OC with dark-colored lanyards with the phrase "Air Line Pilots Association, Int'l." stamped on them with white ink. When the campaign began, ALPA handed out lanyards to OC members and other pilot supporters who wanted to show support for ALPA and the OC. The lanyards also served as a way to identify like-minded pilots.

4. In the summer of 2006, I was wearing my ALPA lanyard at Palm Springs International Airport when I was confronted by Capt. Tony Hoetker, Chief Pilot for the Western Region. Capt. Hoetker requested that I remove my ALPA lanyard.

5. In December of 2006, I attended upgrade training at SkyWest's training facility near Salt Lake City International Airport. During the training, SkyWest Director of Flight Training Dave Faddis visited the class. Mr. Faddis reports directly to Brad Holt, SkyWest Vice-President for Operations.

6. Approximately an hour after Mr. Faddis departed class, my instructor, Jason Meister, approached me and pulled me aside. Mr. Meister told me that Mr. Faddis saw that I was wearing an ALPA lanyard. Mr. Meister said that wearing an ALPA lanyard is a "slap in the face" to SkyWest, and that if I wanted to be an ALPA member I "should fly for an ALPA airline". He also told me that Mr. Faddis wanted me to remove the lanyard and not wear it at any time in the training center.

7. Shortly after my conversation with Mr. Meister, I sought out Verdeen Heiner, SkyWest's Manager for Flight Training, to inform him of this incident. Mr. Heiner told me that SkyWest management did not want me to wear an ALPA lanyard in the training center, did not want me to discuss ALPA while in the training center, and did not want ALPA to become an issue in the training center at all.

8. Mr. Heiner told me that I would not be allowed to wear my ALPA lanyard or discuss ALPA while on the training center property. He said that he meant no personal offense and has had this conversation with other ALPA supporters that have gone through training.

9. During the entire training session, two of my classmates continued to wear lanyards that were also in violation of the SkyWest uniform policy on logo lanyards. One wore a lanyard emblazoned with the logo for "LA Fitness" and the other wore a "Bombardier" lanyard. To my knowledge they were not confronted about their non-conforming lanyards or given other lanyards to wear.

I declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

5/1/07

Date

A handwritten signature in black ink, appearing to read "David Boehm", written over a horizontal line.

David Boehm